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May 26, 1993

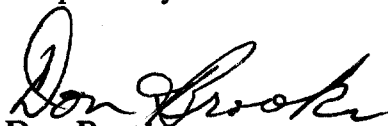
In the Matter of

Replacement of Part 90 by
Part 88 to Revise the Private
Land Mobile Radio Services and
Modify the Policies Governing them.

To: The Federal Communications Commission

Comments of The Texas Chapter of the Associated Public Safety Communications Officers
are being submitted for your consideration.

Respectfully submitted



Don Brooks,

President

Texas Chapter

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PR DOCKET 92-235 /

REPLY COMMENTS OF THE TEXAS CHAPTER, APCO

The Texas Chapter, APCO is the largest public-safety telecommunications organization in the State of Texas. Its membership has as its representation comes from all public-safety and emergency radio services at all levels of government. This membership is representative of all sections of the State of Texas from the largest metropolitan areas to the vast expanses of the Western plains.

Texas Chapter, APCO provides one full time Frequency Advisor and one part time Frequency Advisor. For several years, these advisors have processed more frequency coordination applications for National APCO than any other State in the United States within the guidelines set forth by the Federal Communication Commission, FCC.

The Texas Chapter, APCO wishes to emphasize to the Commission that the frequency coordination process for public-safety radio must be accomplished in such a way as to be as spectrum efficient as possible. There is no argument that the radio spectrum is a limited resource. We must insure that specific frequency recommendations will protect existing systems, as well as provide adequate capability for the applicant. The nature of the use of radio by public-safety agencies requires the frequency coordination process give special consideration to the coordination of the frequencies used routinely for the public benefit of emergency "life and death" communications.

The Texas Chapter, APCO wishes to commend the Commission for undertaking this tremendous task of rewriting the rules for Private Land Mobile Radio. We support the Commissions decision to adopt Spectrum Efficiency Standards, Channel Exclusivity, consolidate of the current 20 radio services, new technical and operational standards, as well as permitting centralized trunking. In addition to channels for new high technology operations, and possibly most important, simplifying the rules. The following comments on PR Docket 92-235 are submitted for your consideration and possible implementation.

A. SPECTRUM EFFICIENCY STANDARDS

Narrowband technology will provide greater efficiencies over time. Moving the 25 KHz channel spacing to 12.5 and eventually to 6.25 KHz in the UHF band (421-512), in bands 72-76 (for low power mobile operation) and moving the 150-174 bands to 5 KHz channel spacing will require stringent enforcement. This is a move in the right direction. However, unless the Commission directs efficiency standards on radio receivers, adjacent channel interference will become an uncontrollable problem.

Limitations on power, antenna height, effective radiated power (ERP) and mile radius will blend itself to frequency reuse at shorter distances than assignments are presently being conducted. Limiting the ERP by antenna height above average terrain is commendable. However, the earth is not flat. This will not provide the coverage required. The Texas Chapter OF APCO fully supports the proposal provided by the LMCC. Each coordinating service must the authority to enforce the ERP issue in providing the required coverage area of the agency involved. They must have the authority to request additional technical data, not asked on FCC form 574, in order to provide the agency with a quality assignment. In addition, the authority to enforce the assignment should be given to the coordinator. Use of the maximum ERP should be the exception and not the standard.

CONCERNING LOADING STANDARDS. It us felt that unless the existing licenses can meet the loading standard, they should not be eligible to retain two narrowband channels. This may cause agencies to begin frequency hoarding. The standard must be set on loading and enforced.

B. EXCLUSIVITY

Exclusive use overlay should be used for large agencies that have a large area of coverage to maintain. Examples would be State, County, and Municipal that require countywide coverage. Close coordination and monitoring of this type of operation will be required. It is believed that for a agency to obtain exclusivity, they must submit a plan of operation for approval by the Regional Planning Committee, the coordinator and the Commission prior to being granted exclusivity. This should be equivalent to the Regional 821 Plans. The Texas Chapter APCO, through its frequency coordination effort is willing to coordinate this responsibility for Public-Safety in the State of Texas.

C. RADIO SERVICES

Consolidation of the coordination service pool into three distinct bodies, has merit.

The Public Safety pool proposed the 88.613 have not been designated to any specific radio service. Only one of the present authorized Public Safety coordinators should be identified as the Public Safety coordinator. APCO has coordinated more frequencies in the public safety service than the other public safety coordinators combined. APCO should be designated the Public Safety coordinator. Allowing all of the present public safety coordinators the authority to coordinate public safety frequencies will cause additional workload on the Commission. Conflict resolution will demand a large commitment on the part of the Commission's staff. Conflict will occur simply because two or more coordinators may and often times will coordinate the same frequencies for two or three different services within the same area if operation.

To assist the Commission in resolving conflicts. Texas APCO recommends the Commission extend the authority to resolve conflict to the coordinator. Rule 90.171 (b) proposed new rule 88.171 (b) does not provide a coordinator any authority in resolving interference problems. Providing the coordinator this authority will restrict the number of complaints of interference the commission receives. If the coordinator can not resolve the problem, then the coordinator will provide the commission with his/her recommendation and the replies of the parties concerned. The commission will be the final authority.

There is a strong working relationship between the three coordinators in the 800 MHz spectrum. there is no reason not to allow them to coordinate below 512 MHz.

will make them inoperable.

In limiting the ERP, the maximum the commission directs should be the exception and not the rule. Each request for frequency must fully justify the requirement for the ERP requested. Every application must be fully justified for the power, antenna height, and area of coverage.

2. **INTEROPERABILITY.** Interoperability is a prime concern to the Police Agencies in the State of Texas. We must have that capability. APCO Project 25 has set standards for digital communications. However, the Federal Government has set the standard for their radio equipment to meet the standard in Project 25. The standard in Project 25 is covered in the UHF spectrum. However, VHF will not be compatible with the 6.25 KHz of the Federal Government and the 5.0 KHz if the Land Mobile Community. Specifically our Police agencies. Compatibility is a must.
3. **INNOVATIVE SHARED USE.** If the Commission keeps the proposed 5 KHz bandwidth in the VHF spectrum, the placing of 258 channels for innovative shared use operation next to Public Safety channels may cause interference to Public Safety users. Texas APCO recommends the innovated channels not be placed in the Public Safety Band. Keep the Public Safety Band reserved for Public Safety agencies only.
4. **Trunked Operation.** In order to develop a efficient trunking system the VHF frequencies must be paired. To have frequencies randomly assigned would defeat the overall trunking feature. It is suggested that while the Commission is realigning the VHF spectrum, please complete the process by pairing the VHF spectrum. This will enable the coordinators to keep base and repeater operations on specific frequencies, as well as mobile operations on designated frequencies. Trunking would be much easier to control and license.
5. **MISCELLANEOUS PROPOSALS**

MODIFICATION OF EXISTING SYSTEMS. The Texas Chapter of APCO has great concern about the January 1, 1996 date for existing systems to meet the deviation standard. This may seem to be a manual adjustment to existing equipment and or a software change, the expense will be devastating to many agencies. The date to have existing systems modified should be moved to 1998 or later. Texas APCO also encourages the Commission to formally notify each licensee when they must have their systems modified two (2) years in advance of the deadline. This will provide an adequate time for budgetary planning.